

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

RAQUEL CLARK,

Plaintiff,

-vs-

CASE NO. 1:20-CV-00074
HON. HALA Y. JARBOU

**COUNTY OF MUSKEGON,
ASHLEY N. DEROOY, and
JERID HERMAN, in their individual and
official capacities,**

Defendants.

CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) AMY J. DEROUIN (P70514) Attorneys for Plaintiff 9750 Highland Road White Lake, MI 48386 (248) 886-8650 / (248) 698-3321-fax amy.derouin@cjtrainor.com	CUMMINGS, MCCLOREY, DAVIS & ACHO ALLAN C. VANDER LAAN (P33893) Attorney for Defendants 2851 Charlevoix Drive SE, Ste. 327 Grand Rapids, MI 49546 616-975-7470 / 616-975-7470-fax avanderlaan@cnda-law.com
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PLAINTIFF'S PRELIMINARY LAY AND EXPERT WITNESS LIST

NOW COMES Plaintiff, **RAQUEL CLARK**, by and through her Attorneys, CHRISTOPHER TRAINOR & ASSOCIATES, and for her *Preliminary Lay and Expert Witness List* discloses the following witnesses, who may be relied upon for testimony at the time of trial in this matter.

1. Raquel Clark
Plaintiff
c/o Plaintiff's Counsel
2. Ashley N. DeRooy
Defendant
c/o Defendants' Counsel
3. Jerid Herman
Defendant
c/o Defendants' Counsel
4. Estus McGee
Plaintiff's boyfriend
c/o Plaintiff's counsel
5. Darrel Clark
Plaintiff's brother
c/o Plaintiff's counsel
6. Desirea Smith
Plaintiff's sister
c/o Plaintiff's counsel
7. Markus Walter
Plaintiff's son
c/o Plaintiff's counsel
8. Navie Crawford
Plaintiff's son's friend
Address unknown
9. Any and all employees, agents, medical treatment providers, representatives, and/or custodian of records for the following:

- a. Muskegon County Sheriff's Department/Muskegon County Jail
990 Terrace Street
Muskegon, MI 49442
 - i. Michael J. Poulin, Sheriff
 - ii. Britni Brinkman, EMT/CMA
 - iii. Nurse Carl Schotts
 - iv. Sgt. Jones-Burton
 - v. Sgt. Gilchrist
 - vi. Theresa Jones-Burton, Shift Commander
 - vii. Angie Cregg, FOIA Coordinator
 - viii. Mark Burns, Jail Administrator
 - ix. F. Boxer, LPN
 - x. Lt. Matthew Smith
 - xi. Scott Smith
 - xii. Sgt. Meyers
- b. Muskegon Heights Police Department
2715 Baker Street
Muskegon, MI 49444
 - i. Officer Brandon G. DeKuiper
 - ii. Sgt. Scott D. Sinclair
 - iii. Chief of Police Joseph Thomas
 - iv. Devin E. Hopkins
- c. 60th District Court
990 Terrace Street, #105
Muskegon, MI 49442
 - i. Judge Harold F. Closz, III
 - ii. Magistrate Cavan J. Berry
- d. Muskegon County Prosecutor's Office
120 West Apple Avenue
Muskegon, MI 49440
 - i. Susan Franklin, Esq.
- e. Toombs Funeral Home
2108 Peck Street
Muskegon Heights, MI 49444

10. Any and all physicians, surgeons, nurses, nurses' aides, therapist, counselors, agents, records custodians, billing clerks, employees, and/or other named individuals of Plaintiff's medical treatment providers and of the following:

a. Mercy Health Hackley Campus
1700 Clinton Street
Muskegon, MI 49442

- i. Dr. Brandon King
- ii. Dr. Daniel Osborn
- iii. Dr. Tyler Rummel
- iv. Dr. Sara Edward
- v. Dr. Courtney Garlick
- vi. Dr. Jerry A. Evans
- vii. Lubbers, PA
- viii. Elizabeth K
- ix. Dr. Sarah Golub
- x. Dr. Gerald Buchanan
- xi. Dr. Amy A. Bishop
- xii. Dr. Marc Whitaker
- xiii. Dr. James Ringler
- xiv. Dr. Joseph Betcher
- xv. Dr. Lindsay Rudert
- xvi. Rachel DeBruin PA
- xvii. Dr. Tyler Voss
- xviii. Dr. Michael J. Oneka
- xix. Dr. Roni Devlin
- xx. Dr. Kathy Rosema
- xxi. Adam Geller PA
- xiv: Dr. Erik Sievertsen

b. Orthopedic Associates of Muskegon
1400 Mercy Drive
Muskegon, MI 49444

- i. Dr. James Ringler
- ii. Dr. Lindsay Renee Rudert
- iii. Dr. Tyler Voss
- iv. Dr. Brandon King
- v. PA Adam Geller
- vi. Dr. Courtney Garlick
- vii. Dr. Sara Edward
- viii. Dr. Tyler Rummel
- ix. Dr. Daniel Osborn
- x. Anna Glore, PA

- c. Muskegon Family Care
2201 S. Getty Street
Muskegon Heights, MI 49444
 - i. Dr. Michael Oneka

- d. Holland Hospital
602 Michigan Avenue
Holland, MI 49423
 - i. Lisa Woolsey, PAC
 - ii. Dale Piapp, MD
 - iii. Donald M. Fix, MD
 - iv. Richard R. Harper, MD
 - v. Michael Page, MD
 - vi. William Harris, MD
 - vii. Brian Holt, DO
 - viii. W. Zwaag, MA
 - ix. Karen Bedford
 - x. Boyd Kroeze, MD
 - xi. Scott Loos, MD
 - xii. John Nicely, MD
 - xiii. Dr. Gerard
 - xiv. Mark Lenters, MD
 - xv. David Johns, MD
 - xvi. Brian Cote, DO
 - xvii. Daniel Hoekstra, NP
 - xviii. Clint Griffin, MD
 - xix. Grace Pommerening, RN
 - xx. William D. Reed
 - xxi. Sandip Kothari
 - xxii. James Robert Ringler, MD
 - xxiii. Roni Devin, MD
 - xxiv. Michelle Harlen
 - xxv. Katelyn Reimink
 - xxvi. Delynn Unema
 - xxvii. Sarah Ashley
 - xxviii. Callie R. Sterenberg
 - xxix. Kimberly A. Leist, RN
 - xxx. Edward J. Maas, MD
 - xxxi. Tara Jipping, RT
 - xxxii. Tricia Cabrera, RT
 - xxxiii. Debra J. Knikelbine
 - xxxiv. Lana J. Zarlenga, MD
 - xxxv. Rebekah S. Schicker, RN
 - xxxvi. Adam C. Blystra

xxxvii. Dale M. Plapp, MD
xxxviii. Jean Kreitner
xxxix. Mary Weidman
xl. Linda Compagner, LPN
xli. Melonie M. Mejia
xlii. Jesus Gamez
xliii. Amber R. Kouw, RN
xliv. Diane Sale, LPN
xlv. Judy Lynn Sall, RN
xlvi. Deborah Makowski
xlvii. Leslie A. Hemmes
xlviii. Jessica M. DeJonge, RN
xlix. Marci J. Shaw, LPN
l. Judy Knoper, CMT
li. Carol L. Vanfarowe, RN
lii. Barbara VanderMale, LPN
liii. Angie K. Farris
liv. Kimberly Smeyers, RN
lv. Karen M. Alofa
lvi. Christine E. Decker, RN
lvii. Karen Bandstra, RN
lviii. Margaret A. Duncan, MD
lix. Judy Hilkema, LPN
lx. Jennifer Funkhouser, MSW
lxi. Laura A. Brown
lxii. Geoffrey Bernd, RN
lxiii. Shelly Eade, RN
lxiv. Cherie Olsen, RN
lxv. Tina M. Quinn, RN
lxvi. Kaleena Chilcote
lxvii. Sandy L. Tubergen
lxviii. Boyd Kroeze, MD
lxix. Ginelle Koopa
lxx. Elisabeth A. VanderZwaag, MMA
lxxi. Jan Lancaster, RN
lxxii. James R. Dumerauf, MD
lxxiii. Diane Seymour
lxxiv. Kristie S. Potts, RN
lxxv. LuAnn Sollom
lxxvi. John C. Visser, RN
lxxvii. Tasha Bourne, MMA
lxxviii. Trudy J. Mannes, RNC
lxxix. Janis Spotts, RN
lxxx. Laura Bennington, RN

lxxxi. Katherine Bryers, MMA
lxxxii. Thomas Kuhn, MD
lxxxiii. Kathryn Ellis-Ramirez
lxxxiv. Jan Desmet, LPN
lxxxv. Tina Marie Page, MMA
lxxxvi. David VanFarowe, MHA
lxxxvii. Tomasa Glenn, RN
lxxxviii. Jacklyn Arellano
lxxxix. Sandi Ockerse, MHA
xc. Katherine Bryers, MHA
xci. Tomasa Glenn, RN
xcii. John C. Visser, RN
xciii. Marshall K. Lohman
xciv. Margaret M. Young, NP
xcv. Karen Ledford, MSW
xcvi. Jan Desmet, LPN
xcvii. Mary Hoffman
xcviii. Mary Van Andel
xcix. Bonnie Tolsma, RN
c. Janis Baskers, RN
ci. Norma Hook, RN
cii. Joan E. Kootstra, RN
ciii. Diane M. Bruza, MD
civ. Frederick Kellaway, MD
cv. Timothy M. Gezon, MD
cvi. Kristi O'Neill
cvii. Juan Jr. Barbosa, RN
cviii. Marcy Archterhof, RN
cix. Jillayne Graves
cx. Kerrilyn Tibbs
cxii. Scott A. Loos, MD
cxiii. Gary L. Bowman, DO
cxiiii. Kimberly Smyers, RN
cxv. Karen S. Kalkman, RN
cxvi. Mary L. Chheng
cxvii. Camille Kass, RN
cxviii. Carole J. Riegman, RN
cxix. Ling Wang, MD
cxx. Martina Dykstra, RN
cxx. Rose M. Kruithof, LPN

- e. Mercy Health Muskegon
1500 E. Sherman Blvd.
Muskegon, MI 49444
 - i. Renee M. Bates
 - ii. Katherine R. Brady, DO
 - iii. Kevin D. Hess, DO
 - iv. Sabrina A. Morgan, RN
 - v. Lucas Leete, MD
 - vi. Vicky L. Bean
 - vii. Darlynn L. Cooper
 - viii. Melinda Mahan, RN
 - ix. Veronica Gomez
 - x. Tracy Kemmerling, RN
 - xi. Lynn Heacock, RN
 - xii. Nancy Beardsley, RN
 - xiii. Caroline E. Pogany LBSW
 - xiv. Michael J. Oneka, DO
 - xv. Steven L. Costello, RN
 - xvi. Brian Raymond Smith, MD
 - xvii. Tara Blandford-Mayberry, RN
 - xviii. Karissa L. Welch
 - xix. Adam James Geller, PA
 - xx. Daniel A. Osborn, MD
 - xxi. Kathy L. Rosema, DO
 - xxii. James R. Ringler, MD
 - xxiii. Anna F. Glore, PA
 - xxiv. Nina Mulder, OT
 - xxv. Leslie Kempers, PT
 - xxvi. Nicole M. Plichta, RN
 - xxvii. Peter V. Severson, MD
 - xxviii. Barbara Munro, RRT
 - xxix. English H. Rex, RN
 - xxx. Deborah J. Kittel, RN
 - xxxi. Elizabeth A. Pike, RPh
 - xxxii. Kalene M. Sietsema, RN
 - xxxiii. Kirk J. Powell
 - xxxiv. Linda Cwynar, RN
 - xxxv. Taylor M. Rider
 - xxxvi. Kendall P. Wickstrom
 - xxxvii. Maniah DooleyMadison Telder
 - xxxviii. Jeannette Horn
 - xxxix. Kimberly Warfield
 - xl. Lakesha R. Crawford
 - xli. Rachel DeBruin, PA

- xlii. Erik E. Sievertsen, MD
- xlili. Justin Bing, RN
- xliv. Lindsay R. Ruder, DO
- xl v. Llana Workman, RN
- xlvi. Joseph A. Betcher, MD
- xl vii. Sharon E. White, RN
- xl viii. Erica L. Eklund, RN
- xlix. Jessica A. Pikel, RN
- l. Mark A. Langlois, RN
- li. Noel Bell, MD
- lii. Diana L. Apostle, RN
- liii. Marc E. Whitaker, MD
- liv. Tammy Anderson
- lv. Amy A. Bishop, MD
- lvi. Gerald L. Buchanan, MD
- lvii. Sara M. Wolting, RN
- lviii. Jennifer Wilson
- lix. Sarah M. Golub, PA
- lx. Geraldine A. Rance, CRT
- lxi. Susan K. Grawbarger, RN
- lxii. Elizabeth K. Lubbers, PA
- lxiii. Amy L. Bonebrake, RN
- lxiv. Kathryn E. Kampen, MD
- lxv. Susan L. Phelps, RN
- lxvi. Ramona M. Wallace, DO
- lxvii. Tammy L. Provatas, MD
- lxviii. Justin Bing
- lxix. Sharon K. Uher, RN
- lxx. Marc B. Ydenberg, MD
- lxxi. Maureen R. Street, MD

f. Correct Care Solutions

1283 Murfreesboro Rd., Ste. 500
Nashville, TN 37217

- i. Richele L. Marion, EMT
- ii. Jennifer M. Swanger, LMSW, CAADC
- iii. Heather Ihrig, RMA
- iv. Carteen Blanche, RN
- v. A. Schotts, RN
- vi. Walter Uyesugi, DO/LE
- vii. Joseph Natole, MD
- viii. Katy Castillo, LPN
- ix. Sara Bruce, EMT
- x. David Lopez, RN

- xi. Danielle Carlson, LPN
- xii. Britni Brinkman, EMT
- xiii. Ashleigh Severance, LPN
- xiv. Nycolle Kowalczyk, MA/LNA
- xv. Jessica Fairbanks

g. Community Mental Health of Ottawa County
12265 James St.
Holland, MI 49424

- i. Trina Crowe, LMSW
- ii. Krista Bedells, NP
- iii. Rhonda Rutan

h. HealthWest
376 E. Apple Ave.
Muskegon, MI 49442

- i. Stanley L. Seuferer, DO
- ii. Greg Green, MD
- iii. Lillian Dempsey
- iv. Heather L. Wiegand, LLPC
- v. Pamela Beane, LMSW

i. Medicaid
PO Box 30435
Lansing, MI 48909-7979

j. Meridian Health Plan of Michigan

k. PBC Healthy Michigan Plan

11. ACEMCO
7129 Enterprise Drive
Muskegon, MI

12. Magna Mirrors Holland
3401 128th Avenue
Holland, MI 49424

13. Workbox Staffing
1930 E. Apple, Suite H
Muskegon, MI 49442

14. Forge Industrial Staffing
1042 E. Sternbeg Dr.
Muskegon, MI 49444
15. Burger King
735 Michigan Ave.
Holland, MI 49423
16. Internal Revenue Service
Stop 37106
Fresno, CA 93888
17. U.S. Department of Treasury
Treasury Building
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220
18. Michigan Department of Treasury
430 W. Allegan St.
Lansing, MI 48922
19. W. Ken Katsaris, Field of Crime Scene Investigation/Jail Policy and Procedures/Inmate Treatment/Jail Customs Policies and Practices Expert, 110-A South Monroe Street, Tallahassee, FL 32301
20. Edward John Primeau, CCI, CFC of Primeau Forensics, LTD, Audio and Video Forensics Expert, 1878 Star Batt Drive, Bldg. 2E, Rochester Hills, MI 48309
21. Evan Milefchik of Envision Information Technologies, Information Technology Expert, 302 Legato Drive, Walled Lake, MI 48390
22. Experts, the necessity of which are revealed by further discovery.
23. Any and all rebuttal expert witnesses.
24. Any and all witnesses, both lay and expert, identified on any list filed by any party.
25. Any and all persons named or called as a witness by any party.
26. Any and all persons and/or entities named or referred to by any deponent during their deposition.
27. Any and all persons deposed.

28. Any and all persons and/or entities named or referred to by any party in their responses to Requests for Production of Documents.
29. Any and all persons and/or entities named or referred to by any party in their written responses to Interrogatories.
30. Any and all persons whose testimony is required to admit and/or authenticate evidence.
31. Any and all necessary rebuttal witnesses.
32. Any and all necessary surrebuttal witnesses.
33. Any and all witnesses who may be disclosed through discovery as it is currently ongoing.

Plaintiff reserves the right to amend, modify, supplement, or add to this witness list any other witness as they become necessary and/or known by subsequent investigation and/or discovery, and to file amended witness lists from time to time for this purpose.

Respectfully Submitted,
CHRISTOPHER TRAINOR & ASSOCIATES
s/Amy J. DeRouin
CHRISTOPHER J. TRAINOR (P42449)
AMY J. DEROUIN (P70514)
Attorneys for Plaintiff
9750 Highland Road
White Lake, MI 48386
(248) 886-8650
amy.derouin@cjtrainor.com

Dated: October 9, 2020
AJD/llw

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: *None*.

s/ Amy J. DeRouin (P70514)
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White Lake, MI 48386
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